

Reserve Office 203 West 4th Street PO. Drawer T Reserve, LA 70084-0519 Retail Office 131 Belle Terre Blvd. LaPlace, LA 70068 8:30 am - 5:00 pm M-F

Reserve Telephone Company, inc.

Reserve (985) 536-1111 • LaPlace (985) 359-2222 •

www.rtconline.com

Received & Inspected MAR 19 2009 FCC Mail Room

March 18, 2009

Marlene H. Dortch, Office of the Secretary **Federal Communications Commission** ATTN: Enforcement Bureau - Telecommunications Consumers Division 445 12th Street, SW Washington, DC 20554

Dear Secretary Dortch,

Reserve Telephone Company, Inc. (RTC), NAL Acct. No. 200932170711, and Reserve Long Distance Company, Inc. (RLD), NAL Acct. No. 200932170710, are in receipt of the Notice of Apparent Liability for Forfeiture dated February 24, 2009.

RTC and RLD both inadvertently failed to file their annual CPNI compliance certifications for 2007. The filings have since been uploaded to the ECFS as of March 18, 2009. Protecting Consumers Proprietary Information is of utmost importance to Reserve Telephone and Reserve Long Distance and missing the compliance filing deadline was in no way willful or intentional.

Historically, neither company uses CPNI for any internal marketing efforts and certainly has never distributed CPNI to any outside third parties. Management does maintain a file of any CPNI violations whether internal or through customer complaints. To date there has been none. The companies filed CPNI certifications for 2008 and have enclosed copies of the 2006 certifications maintained internally.

We have enclosed with this letter the 2007 missed filings for Reserve Telephone and Reserve Long Distance. Also enclosed is a copy of the CPNI Manual both companies use. Please accept this letter and these enclosures as our apology for the missed filings as well as evidence of overall CPNI compliance.

Sincerely,

Scott Small

Director of Operations

Enclosures

Cc: Marcy Greene, Deputy Chief, Telecommunications Consumers Division, Enforcement Bureau, FCC

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Federal Communications Commission

The FCC Acknowledges Receipt of Comments From ... Reserve Telephone Company ...and Thank You for Your Comments

Your Confirmation Number is: '2009316678529'

Date Received:

Mar 16 2009

Docket:

06-36

Number of Files Transmitted: 1

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Beacon 3

Telecommunications Advisors

8801 South Yale Avenue, Suite 450 Tulsa, Oklahoma 74137 Telephone 918.496,1444

เราเราะ beaconbright.com

March 18, 2009

Reserve Telephone Company P. O. Drawer T 203 West Fourth Street Reserve, LA 70084-0519

Marlene H. Dortch, Office of the Secretary Federal Communications Commission 445 12th Street, SW Suite TW-A325 Washington, DC 20554

RE: EB Docket No. 06-36

Via: ECFS

Dear Secretary Dortch:

Pursuant to 47 C. F. R. § 64.2009(e); please find the accompanying annual CPNI certification and statement for calendar year 2007 for Reserve Telephone Company form 499 filer ID number 807054; FRN 0001714708.

This 2007 filing is made at this time to cure an inadvertent omission brought to our attention in NAL dated February 24, 2009 by Enforcement Bureau Chief, Kris Anne Monteith. The NAL account number for Reserve Telephone Company is 200932170711; the EB file number is EB-08-TC-5220

Should you have any questions regarding this filing, please direct them to the undersigned.

Best Regards.

Keith Gile

Consultant

Cc:

Byron McCoy, Telecommunications Consumer Division, Enforcement Bureau via email: byron.mccoy@fco.gov

Best Copy Printing via email: fcc@bcpiweb.com

Annual 47 C. F. R. § 64:2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date Filed: 03/18/2009

Name of company covered by this certification: Reserve Telephone Company

Form 499 Filer ID: 807054

Name of signatory: Darcey Delatte

Title of Signatory: Controller

I, Darcey Delatte, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C. F. R. § 64,2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in sections 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed Darry C Delatte

MAR 19 2009

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Reserve Telephone Company (The Company) STATEMENT OF COMPLIANCE WITH CPNI 47 U.S.C. §222, and 47 C.F.R. § 64.2001- 64.2011 EB Docket No. 06-36

The Company has established operating procedures that ensure compliance with Federal Communication Commission regulations regarding the protection of customer proprietary network information ("CPNI"). The Company maintains a CPNI policy manual that covers in detail the material summarized below.

CPNI Use

- The Company does not use or disclose CPNI without customer consent, except as permitted by 47 U.S.C. § 222 or 47 C.F.R. § 64.2005.
- The Company may use CPNI without customer consent to market communications-related services within those categories of service to which a customer already subscribes.
- The Company may use CPNI to market other communications-related services only after providing each customer with an opt-out notice via regular mail.
 - Customers may "opt out" of the use of CPNI described in the opt-out notice at any time via toll free number, email, regular mail, or business office visit.
 - o The Company waits 33 days before assuming that a customer has consented to the use of CPNI described in the opt-out notice, provided that the customer has not already "opted out" of such use.
 - o The Company records each customer's opt-out preference in the Company's automated information system, allowing the customer's opt-out consent status to be determined prior to use of CPNI.
 - o The opt-out notice is refreshed every two years.
 - o The Company provides written notice to the FCC, within five business days, of any instance where opt-out procedures do not work properly and to such a degree that the customer's inability to opt-out is more than an anomaly.
 - The Company requires supervisory review to ensure that any proposed uses of CPNI are covered by existing notices,
- The Company does not use or permit third parties to access CPNI for marketing purposes. As such, the Company generally does not seek opt-in consent from its customers.
- During customer-initiated telephone calls or business office visits, and following successful authentication, a
 customer may be asked to provide one time opt-in consent to allow the Company to use CPNI for marketing
 purposes during that call or visit.
- The Company requires sales personnel to obtain supervisory approval of all requests to use CPNI for outbound
 marketing, and maintains records of compliance for at least one year,

Authentication of Customer Identity

- The Company uses the procedures specified in 47 C.F.R. § 64.2010 to authenticate a customer's identity before sharing any CPNI with that customer.
- For in-person requests, the Company requires the customer to present a valid, government-issued photo ID.
- For telephone requests, the Company requires the customer to provide a password that is not prompted by a request for readily available biographical information, or account information. The company also uses a "hint" question and answer as a back-up means of authentication for each customer, which does not prompt the customer for readily available biographical information or account information.
- If the Company cannot authenticate the customer, the Company will release CPNI only by sending it to the customer's address of record, provided that it has been in effect for at least 30 days.

Training and Disciplinary Measures

The Company has implemented internal procedures to educate and train new employees about proper and improper use of CPNI and the disclosure of CPNI. The Company has designated CPNI Compliance officer(s) that are responsible for the active monitoring, management and training of all employees with access to CPNI - including but not limited to customer service representatives.

Employees are instructed to report each potential CPNI violation or breach to supervisors, and the Company has

a process for documenting and investigating each potential violation or breach.

The Company has established disciplinary procedures for any employee that wrongfully accesses, uses, or discloses CPNI, which explicitly state that employees can be terminated for failure to follow the Company's CPNI policies and comply with the Commission's CPNI rules.

Restricted Access to Records and Facilities

- The Company's automated information system, which contains the CPNI of the Company's customers, is password-protected.
 - o Employees with access are required to lock their terminals before leaving their workstation unattended.
 - o Supervisors are required to monitor employees for compliance with all system security measures.
- All physical facilities containing CPNI are secured, with restricted physical access.

Management of Potential CPNI Breaches and Law Enforcement Requests for CPNI

 Consistent with 47 C.F.R. § 64.2011, the company has adopted procedures for notifying law enforcement of CPNI breaches and providing deferred notification to customers.

The Company maintains records of any and all potential CPNI breaches.

The Company validates the authenticity of all requests from law enforcement, and ensures that such requests are lawful, before releasing CPNI.

(FC) Federal Communications Commission

The FCC Acknowledges Receipt of Comments From ...

Reserve Long Distance ... and Thank You for Your Comments Received & Inspected

MAR 19 2009

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Your Confirmation Number is: '2009316971163'

Date Received:

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Docket:

06-36

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Telecommunications Advisors

8801 South Yale Avenue, Suite 450 Tulsa, Oklahoma 74137 Telephone 918.496,1444

www.beaconbright.com

March 18, 2009

Reserve Long Distance P. O. Drawer T 203 West Fourth Street Reserve, LA 70084-5019

Marlene H. Dortch, Office of the Secretary Federal Communications Commission 445 12th Street, SW Suite TW-A325 Washington, DC 20554

RE: EB Docket No. 06-36

Via: ECFS

Dear Secretary Dortch:

Pursuant to 47 C. F. R. § 64.2009(e); please find the accompanying annual CPNI certification and statement for calendar year 2007 for Reserve Long Distance form 499 filer ID number 807055; FRN 0009873712.

This 2007 filing is made at this time to cure an inadvertent omission brought to our attention in NAL dated February 24, 2009 by Enforcement Bureau Chief, Kris Anne Monteith. The NAL account number for Reserve Long distance is 2009321700710; the EB file number is EB-08-TC-5219.

Should you have any questions regarding this filing, please direct them to the undersigned.

Best Regards,

Keith Gile Consultant

Cc:

Byron McCoy, Telecommunications Consumer Division, Enforcement Bureau via email: byron.mccoy@fcc.gov

Best Copy Printing via email: fcc@bcpiweb.com

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Annual 47 C. F. R. § 64.2009(e) CPNI Certification

E B Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date Filed: 03/18/2009

Name of company covered by this certification; Reserve Long Distance

Form 499 Filer ID: 807055

Name of signatory: Darcey Delatte

Title of Signatory: Controller

I, Darcey Delatte, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C. F. R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in sections 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed Darcey Collatte

MAR 19 2009

FCC Mail Room

Reserve Long Distance (The Company) STATEMENT OF COMPLIANCE WITH CPNI 47 U.S.C. §222, and 47 C.F.R. § 64.2001- 64.2011 EB Docket No. 06-36

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 - o The Company waits 33 days before assuming that a customer has consented to the use of CPNI described in the opt-out notice, provided that the customer has not already "opted out" of such use.
 - o The Company records each customer's opt-out preference in the Company's automated information system, allowing the customer's opt-out consent status to be determined prior to use of CPNI.
 - The opt-out notice is refreshed every two years.
 - o The Company provides written notice to the FCC, within five business days, of any instance where opt-out procedures do not work properly and to such a degree that the customer's inability to opt-out is more than an anomaly.
 - The Company requires supervisory review to ensure that any proposed uses of CPNI are covered by existing notices.
- The Company does not use or permit third parties to access CPNI for marketing purposes. As such, the Company generally does not seek opt-in consent from its customers.
- During customer-initiated telephone calls or business office visits, and following successful authentication, a
 customer may be asked to provide one time opt-in consent to allow the Company to use CPNI for marketing
 purposes during that call or visit
- purposes during that call or visit.

 The Company requires sales personnel to obtain supervisory approval of all requests to use CPNI for outbound marketing, and maintains records of compliance for at least one year.

Authentication of Customer Identity

- The Company uses the procedures specified in 47 C.F.R. § 64.2010 to authenticate a customer's identity before sharing any CPNI with that customer.
- For in-person requests, the Company requires the customer to present a valid, government-issued photo ID.
- For telephone requests, the Company requires the customer to provide a password that is not prompted by a request for readily available biographical information, or account information. The company also uses a "hint" question and answer as a back-up means of authentication for each customer, which does not prompt the customer for readily available biographical information or account information.
- If the Company cannot authenticate the customer, the Company will release CPNI only by sending it to the customer's address of record, provided that it has been in effect for at least 30 days.

Training and Disciplinary Measures

The Company has implemented internal procedures to educate and train new employees about proper and improper use of CPNI and the disclosure of CPNI.

The Company has designated CPNI Compliance officer(s) that are responsible for the active monitoring, management and training of all employees with access to CPNI - including but not limited to customer service representatives.

Employees are instructed to report each potential CPNI violation or breach to supervisors, and the Company has

a process for documenting and investigating each potential violation or breach.

The Company has established disciplinary procedures for any employee that wrongfully accesses, uses, or discloses CPNI, which explicitly state that employees can be terminated for failure to follow the Company's CPNI policies and comply with the Commission's CPNI rules.

Restricted Access to Records and Facilities

- The Company's automated information system, which contains the CPNI of the Company's customers, is password-protected.
 - o Employees with access are required to lock their terminals before leaving their workstation unattended.
 - o Supervisors are required to monitor employees for compliance with all system security measures.

All physical facilities containing CPNI are secured, with restricted physical access.

Management of Potential CPNI Breaches and Law Enforcement Requests for CPNI

 Consistent with 47 C.F.R. § 64.2011, the company has adopted procedures for notifying law enforcement of CPNI breaches and providing deferred notification to customers.

The Company maintains records of any and all potential CPNI breaches.

The Company validates the authenticity of all requests from law enforcement, and ensures that such requests are lawful, before releasing CPNI.

Reserve Telephone Company and Reserve Long Distance

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CPNI COMPLIANCE MANIALIAI

RESERVE TELEPHONE COMPANY AND RESERVE LONG DISTANCE

CPNI COMPLIANCE MANAUAL

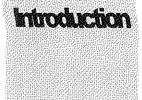
BEACON TELECOMMUNICATIONS ADVISORS 8801 SOUTH YALE• Suite 450•TULSA, OK 74137 Phone 918.496.1444 • Fax 918.496.7733

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RESERVE TELEPHONE COMPANY RESERVE LONG DISTANCE

≺his manual has been created with the intention of helping each employee learn about rules protecting Customer Proprietary Network Information from unauthorized disclosure. As you use this manual keep in mind that rules are not that old, beginning in 1996, and are evolving as evidenced by the recent order in April of 2007. There are many questions yet to be answered. Even so, it is necessary to protect the privacy of individuals and protect the Company from possible enforcement action resulting from unauthorized disclosure of CPNI.





HISTORY OF CPNI

THE BEGININGS OF CPNI RULES CAN BE FOUND IN THE TELECOMMUNICATIONS ACT OF 1996.

he telecommunications act of 1996 was the beginning of CPNI rules consisting of specific steps to protect customer information from unauthorized disclosure.

The rules have been updated in 1998, 2002 and most recently with the April 2007 order and notice of proposed rule making. The April 2007 order implements the authentication requirements and further restricts use/disclosure of CPNI to third parties.



April 2007 Order

FCC enacted safeguards put forth by EPIC.

The order sets forth new requirements Carriers must follow and are covered in this Manual. The requirements will take effect December 8th 2007 subject to OMB approval.

EPIC - Electronic Information Privacy Center

Public advocacy group formed to promote safeguards for consumer privacy.

EPIC petitioned the FCC to include safeguards to thwart pretexing by so called data brokers who offer to obtain and pass call detail records for a fee. Pretexting is the fraudulent impersonation of a customer in order to obtain private call detail information. Most of the safeguards proposed by EPIC were implemented or are in the further notice for proposed rule making portion of the April 2007 FCC release. As discussed in detail later in this manual, Authentication through passwords is required in order to share CPNI.



Taining

Giving employees the knowledge needed to comply with CPNI rules.

New and existing employees must receive adequate instruction on system of control including;

Current rules about protecting customer call detail records

Authentication procedures

Requirement to notify customer of account changes

Opt in /Opt out

Record keeping (when and how CPNI was used)

Disciplinary action

Public Notice requirement

Law Enforcement notification in cases of unauthorized disclosure

Each of these topics are covered in this manual and this manual should be retained and maintained by each employee that has contact with CPNI. Each employee should sign the enclosed employee training certification and provide the signed original to the compliance officer and retain a copy in this manual for the employees' record of completion of training.

Current Rules

Specific rules are set forth in Subpart U of Part 64, of Title 47 of the Code of Federal Regulations as amended.

FCC rules impose a general duty on Reserve Telephone Company to protect the confidentiality of customer information. Reserve Telephone Company may use, disclose or permit access to

customer information only in three circumstances: (1) as required by law; (2) with customer approval; and (3) in providing service from which the customer information is derived.

Reserve Telephone Company must disclose customer information to any person the customer designates if the customer makes a request in writing. Reserve Telephone Company may use customer information without customer approval to market enhancements to services already in use. For example, if the customer has basic local telephone, Reserve Telephone Company does not need customer approval to use customer information to try to sell voice mail, or caller ID services. However, if the customer has asked Reserve Telephone Company to put their residential telephone number on its company specific do-not-call list, Reserve Telephone Company cannot legally make these calls.

If Reserve Telephone Company wishes to use customer information for other marketing including on behalf of affiliates, it must obtain customer approval to do so. Approval may be requested orally, in writing, or electronically. The request must contain specific disclosures about how customer information will be used. Reserve Telephone Company can use one of two methods: (1) Opt In or (2) Opt out. These two methods are described below.

Authentication

Process of validating a customer's identity before using or disclosing any CPNI. The requirement to authenticate a customer's identity has always been required; but with release of the April 2007 order, stronger authentication is required if the carrier discloses call detail information on inbound calls.

- Passwords must be used to share call detail records.
- New customers should be asked to establish a password at the time new service is established.
- Existing customers should be contacted to establish a password

If a customer requests customer service in person, a valid US ID may be used to authenticate the identity of the account holder in order to discuss account information.

BACK UP AUTHENTICATION

If a customer forgets their password then a mutual hint may be shared with the customer to help them remember their password. This information should not be widely available biographical information or account information.

Failing the preceding password authentication, other backup authentication may be used:

- The carrier may call the phone number of record (not a contact number if different). The customer service representative will have to judge whether the person answering the phone is the account holder. To avoid identity questions resulting in this situation, customers should be encouraged to add family members to the account (after identity has been authenticated or upon establishing service).
- The carrier may send call detail to the address of record

Account change notification

The customer should receive notice of changes to their account when any of the following changes have occurred.

- A Notice of account change should be sent at the time a password is established or reset or updated.
- Notice of account change should be sent when mailing address of record is changed.

Opt In

Customer expressly gives approval to use CPNI.

Under Opt In, a notice / request would ask the customer to <u>expressly</u> permit the carrier to use customer information for marketing. In other words the customer provides written approval which needs to be retained by the carrier for one year.

Opt in approval status should be recorded in the Companies tracking system for future reference for the purpose of determining whether the customer has given approval to use their CPNI..

The company's tracking system will be used to identify which customer has expressly approved use of their information for marketing purposes.

RESERVE TELEPHONE COMPANY Reserve long distance CPNI compliance

Note

Since the take rate (number of customers willing to accept marketing information) is low when a customer is specifically asked for approval is very low, Reserve Telephone Company does not typically use Opt in; instead, Reserve Telephone Company uses Opt out (described below) in order to have a much higher take rate.

Opt Out

Method used to get customer approval to use CPNI without the customer having to take any action.

Under this process a notice is sent annually either conspicuously in a statement or as a separate stuffer with explanation of the carriers' objective in seeking customer approval and how the customer may decline to have their information used for marketing purposes. After a minimum 30 day waiting period, any customer that has not declined is deemed to have given implied consent to use their customer information.

Opt out approval status should be recorded in the Company's tracking system for reference in any access situation.

The company's tracking system will be used to identify which customer has given implied consent to use their information for marketing purposes

Notice

Regulatory/Legal required public disclosure.

Notice must be sent every two years to each customer notifying them of the opportunity to opt out of giving approval for use and disclosure of their CPNI for marketing purposes

Reserve Telephone Company will develop an overall privacy policy and publish its privacy policy on its website and will make available upon request in person, by mail or electronically.

RESERVE TELEPHONE COMPANY RESERVE LONG DISTANCE

Compliance File

Central location for documentation of CPNI Compliance

The compliance file should contain at a minimum Annual certification signed by the Compliance officer and statement of established compliance procedures.

This file should contain detail record of the use of CPNI, including primarily when, how, and what CPNI information was used for marketing but for legal purposes as well.

The file should contain records of training including dates and attendance. Training records would consist of training presentation materials.

Signed employee training certifications

Disciplinary actions, circumstances, remedial steps taken

Any instance of breach of privacy where unauthorized disclosure of customer information occurred which should include details of reporting to Law Enforcement

The file should contain a copy of the compliance manual and any updates.

Annual 47 C. F. R. § 64.2009(e) CPNI Certification

E B Docket 06-36

Annual 64.2009(e) CPNI Certification for YEAR
Date Filed, DATE
Name of company covered by this certification: COMPANY NAME
Form 499 Filer ID: 99999
Name of signatory: OFFICER NAME
Title of Signatory. OPFICER 1117.E
I, OFFICER NAME, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C. F. R. § 64.2001 et seq.
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the compan IS/IS NOT in compliance with the requirements set forth in section 64 2001 et seq. of the Commission's rules.
The company HAS/ILAS NOT taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
The company HAS/HAS NOT received ANY/BLANK customer complaints in the past year concerning the unauthorized release of CPNI.
Signed

Employee CPNI Training Certification

I, the undersigned, hereby acknowledge receiving and reviewing Reserve Telephone Company's CPNI Manual. I have completed the training coordinated by Reserve Telephone Company's CPNI Compliance Officer. I further understand my responsibilities to protect CPNI and the disciplinary procedures established by Reserve Telephone Company concerning CPNI.

Name:		
Position:		
Date CPNI	Manual Received:	
Date of CP1	NI Training:	
	Signature	Date
WITNESSED BY ?	THE CPNI COMPLIANCE OF	FICER
	Print Name	<u> </u>
	Signature	Date

Opt Out Notice

NOTICE REGARDING YOUR RIGHTS TO PRIVACY OF INFORMATION:

Under federal law, you have a right, and Reserve Telephone Company has a duty, to protect the confidentiality of CPNI. Customer Proprietary Network Information includes information concerning your account, including such things as the type and quantity of services you subscribe to, and calling information such as the duration of calls. Your approval for our use of CPNI may enhance our ability to offer products and services tailored to your specific needs. With your permission, we can use CPNI to offer you additional products and services that are governed by the Federal Communications Commission, such as those of our affiliates, which will best meet your needs or may save you money. If you would like to give us permission to use your CPNI to market additional products and service from Reserve Telephone Company, you don't need to do anything.

There are some important things you should know when making your decision:

- We will not sell, trade, or share your CPNI with anyone outside of Reserve, except as may be required by law.
- If you decide not to give us permission, simply fill out the information below and return this page to the business office.
- Your decision to permit our use of CPNI or to restrict our use of CPNI will remain in effect until you change it, which you can do at any time, at no charge.
- Your decision only relates to our use of CPNI to market additional Reserve products and services. It
 will not restrict or eliminate other types of marketing contacts.

Please note that this does not authorize us to release your information to any other third parties, only affiliate companies of Reserve Telephone Company.

The protection of your privacy is of utmost importance to us. The employees and management of Reserve Telephone Company thank you for your continued business.

Telephone #	 _	 	 	 	_
1	,				
Name	 		 	 	

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CPNI Disciplinary Procedures

Disciplinary Procedures

Reserve Telephone Company has established the following disciplinary procedures for CPNI violations and breaches.

Violations

Violations include discussing products or services with a customer outside the existing service relationship without the customer's permission; engaging in marketing efforts without observing opt-in and opt-out requirements; and failing to observe customer(s) opt-out request(s).

An initial violation requires the employee to re-read the CPNI manual. Additional violations may result in counseling, retraining, reassignment, suspension, and termination, based on the seriousness and frequency of the violations(s).

Breaches

Breaches occur when an employee acts without authority to gain access to, use, share, or disclose CPNI. Examples include selling or distributing CPNI to third parties, or any action that harms the customer or Reserve Telephone Company.

Breaches may result in counseling, retraining, reassignment, suspension, and termination, based on the seriousness and/ or frequency of the breach (es).

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Certification of CPNI Filing December 31, 2006

EB-06-TC-060

I. Scott Small, hereby certify this 31st day of December, 2006 that I am an officer of Reserve Long Distance Company and that I have personal knowledge that Reserve Long Distance Company. has established operating procedures that are to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R.§§ 64.2001-2009.

Scott Small	ŧ
Officer's Name	1
Director of Operations	
Title AMM/	1.
12/6/06	!
Date	i i

Certification of CPNI Filing December 31, 2006

EB-06-TC-060

I. Scott Small, hereby certify this 31st day of December, 2008 that I am an officer of "Reserve Telephone Company and that I have personal knowledge that Reserve Telephone Company, and its Affiliates have established operating procedures that are to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R.§§ 64.2001-2009.

Scott Small	:
Officer's Name	
	•
Director of Operations	l,
Title MM	1 :
Signature	
12/6/06	·
B. 1	